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GUILLÉN-LLARENA, S. C.

July 1, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Re: Revision of the Commission's Rules to Ensure Compatibility with
Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102

Dear Ms. Salas:

On June 30, 1998, Corsair Communications, Inc. ("Corsair"), represented by David G. Thompson (Vice President, Marketing), William R. Taliaferro (Director, Product Marketing), and Julie Gupta (Product Manager), as well as the undersigned, met to discuss the above-referenced proceeding with the following:

Ari Fitzgerald (Legal Advisor to Chairman Kennard)
Karen Gulick (Legal Advisor to Commissioner Tristani)
David Siddall (Legal Advisor to Commissioner Ness)

Today, Mr. Thompson, Mr. Taliaferro and Ms. Gupta, from Corsair, as well as the undersigned, met to discuss the above-referenced proceeding with the following:

Commissioner Michael Powell
Commissioner Harold Furchtgott-Roth
Peter Tenhula (Legal Advisor to Commissioner Powell)
Paul Misener (Senior Legal Advisor to Commissioner Furchtgott-Roth)
Dale Hatfield (Office of Plans and Policy)
Julius Knapp (Office of Engineering and Technology)
John Cimko (Wireless Telecommunications Bureau)
Nancy Boocker (Wireless Telecommunications Bureau)

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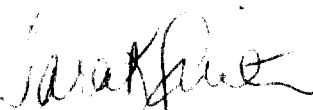
Dan Grosh (Wireless Telecommunications Bureau)
Won Kim (Wireless Telecommunications Bureau)
Ronald Netro (Wireless Telecommunications Bureau)

At the meetings, the participants discussed a number of issues concerning E911 implementation, including the strongest signal proposal of the Ad Hoc Alliance for Public Access to 911. Corsair indicated that this proposal would undermine the rapid deployment of location technologies. Thus, the strongest signal proposal would be inconsistent with the Commission's public safety objectives. The topics of discussion are covered in the enclosed material that was used as a handout for the meetings.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter and its attachment are being filed with your office.

If you have any questions concerning this submission, please contact the undersigned.

Sincerely,



Tara K. Giunta
Counsel for
Corsair Communications, Inc.

cc: Commissioner Michael Powell
Commissioner Harold Furchtgott-Roth
Ari Fitzgerald
Karen Gulick
David Siddall
Peter Tenhula
Paul Misener
Dale Hatfield
Julius Knapp
John Cimko
Nancy Boocker
Dan Grosh
Won Kim
Ronald Netro

June 30, 1998

PRESENTATION OF CORSAIR COMMUNICATIONS, INC.

**Re: REVISION OF THE COMMISSION'S RULES TO ENSURE COMPATIBILITY WITH
ENHANCED 911 EMERGENCY CALLING SYSTEMS -- CC DOCKET NO. 94-102,
RM-8143**

I. Background on Corsair Communications, Inc.

- Corsair is a leading provider of distributed system solutions for the wireless industry. The company provides a variety of wireless products and services, including the PhonePrint™ fraud prevention system and the PhoneCheck™ wireless performance monitoring system, which enables carriers to reduce customer churn and optimize network performance.
- Corsair hardware and software is currently deployed in thousands of cell sites and is in use in over 160 markets worldwide. Corsair's experienced operations, sales and engineering staff actively supports these worldwide installations. Corsair's customers include AT&T Wireless Services, Southwestern Bell, Bell Atlantic Mobile, BellSouth, and GTE Wireless. Corsair also is actively involved in the industry standards setting process.
- PhoneTrack™, Corsair's newest product, uses proprietary time difference of arrival ("TDOA") and other technologies to determine the location of wireless devices, consistent with the Commission's Phase II Automatic Location Identification ("ALI") requirements. PhoneTrack™ will:
 - forward location information immediately to emergency services personnel at public safety answering points ("PSAPs");
 - offer wireless carriers the ability to identify the latitude and longitude of mobile units making 911 calls within a radius of no more than 125 meters; and
 - be available in the United States in 1999, well in advance of the Commission's mandated timeline for deployment of Phase II requirements.

II. The "Strongest Signal" Proposal

- Corsair believes that the strongest signal proposal set forth by the Ad Hoc Alliance for Public Access to 911 is inconsistent with the Commission's public safety policy.
 - The Commission's goal is to ensure the broad availability of E911 services for wireless customers, and to promote major improvements in the quality and reliability of these services.
- The Commission has stated that "ALI will bring important safety benefits to all wireless customers and to the community."¹
 - Accurate location information permits PSAPs to rapidly respond to emergencies, by allowing immediate dispatch of assistance.
 - Corsair will be ready to deploy its PhoneTrack™ product two years prior to the Phase II deadline, thereby increasing the availability of location information for wireless carriers and PSAPs.
- A strongest signal requirement would undermine the availability and rapid deployment of ALI technologies.
 - It would reduce the accuracy of location information, by requiring that the wireless system with the stronger signal carry all 911 calls, regardless of whether other systems in the area offer more accurate location information.
 - It would discourage carriers from investing in early deployment of ALI, because they will not be able to use this capability as a distinguishing system feature.
 - By delaying the deployment of ALI, the strongest signal proposal undermines the Commission's goal of ensuring that technologies that will enhance public safety communications are deployed expeditiously.

¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 18676, at ¶61 (1996).

- The Commission can take additional measures to foster accuracy and reliability of location of information.
 - Filling coverage "holes" is the real solution to providing better access to wireless E911 services. The Commission should adopt policies to improve tower siting and site availability for wireless facilities, in order to promote nationwide availability of E911.

III. Additional Issues

- The Commission should ensure that its rules on E911 are technologically and competitively neutral.
- Handset-based solutions should not receive special treatment.
- The Commission should strive to address cost recovery and carrier liability issues associated with deployment of E911 services. Failure to address these issues could seriously delay implementation of ALI technologies.
- Corsair agrees that carriers, not PSAPs, should choose wireless location technologies.
 - Carriers have the technical expertise to determine which location technologies would work optimally with their systems and provide the best service to customers.

For public safety reasons, the Commission should strive to ensure that the Phase II deadlines remain in place.